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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

9 In Re:

10 RACHAEL A. EARL,

11 DEBTOR.

)
)
) CASE NO. 2:13-bk-18751-EPB
)
) CHAPTER 7
)

12 OBJECTION TO PROOF OF CLAIM FILED BY PYOD, LLC, ITS SUCCESSORS
13 AND ASSIGNS AS ASSIGNEE OF CR EVERGREEN
14 AND NOTICE OF TIME TO RESPOND
(Claim No. 3-1)

15 COMES NOW the Debtor above-named, by and through attorney Allen D. Butler,
16 and hereby objects to the proof of claim filed by PYOD, LLC, ITS SUCCESSORS
17 AND ASSIGNS AS ASSIGNEE OF CR EVERGREEN . This Objection is based upon
18 the following:

19 1. PYOD, LLC, filed a proof of claim on March 6, 2014. Creditor alleges that the
20 balance of the loan at the time of filing was \$22,157.57. See proof of claim No. 3-1.

21 2. Creditor PYOD, LLC did not file supporting documents to verify this claim.

22 Pursuant to Rule 3001(a), the proof of claim "shall conform substantially to the
23 appropriate Official Form" and the instructions contained on the claim form state that
24 the Claimant must attach supporting documents.

25 3. PYOD, LLC filed a six page proof of claim with what appears to be a summary
26 page and a Power of Attorney. No agreement or promissory note validating this
27 creditor's claim was provided.
28

1 ACCORDINGLY, Debtor objects to the proof of claim and requests that the claim
2 be disallowed in full

3 NOTICE is hereby given that if no Response is filed within fifteen (15) days of the
4 date of mailing this Objection, then the Court may sustain this objection without further
5 notice of hearing.

6 Respectfully submitted this July 30th, 2015.

7
8 Allen D. Butler
9 Allen D. Butler, Attorney for Debtors

10 Faxed/Mailed on July 30th, 2015 to:

11 PYOD, LLC, its successors and assigns as
12 assignee of CR Evergreen, LLC
13 c/o Resurgent Capital Services
P.O. Box 19008
Greenville, SC 29602

14 Diane M. Mann
15 P.O. Box 12970
Scottsdale, AZ 85267-2970

16 By /s/ Kathleen Ruiz
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